

Fill in this information to identify the case

Debtor 1 Jeffrey Thomas Sawor

Debtor 2 Suzanne M. Sawor  
(Spouse, if filing)

United States Bankruptcy Court for the: MIDDLE District of PENNSYLVANIA  
(State)

Case number 19-01352

Form 4100R

Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of creditor: Midfirst Bank

Court claim no. (if known):

5

Last 4 digits of any number you use to identify the debtor's account: 6773

Property address: 2023 Furnace Road

Number Street

Felton PA 17322

City

State

Zip Code

Part 2: Prepetition Default Payments

Check one:

☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.

☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is:

\$ \_\_\_\_\_

Part 3: Postpetition Mortgage Payment

Check one:

☐ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on:

    /    /      
MM/DD/YYYY

☒ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due:

(a) \$0.00

b. Total fees, charges, expenses, escrow, and costs outstanding:

(b) \$800.00

c. Total. Add lines a and b.

(c) \$800.00

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

12/01/2023  
MM/DD/YYYY

**Part 4: Itemized Payment History**

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

**Part 5: Sign Here**

**The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.**

Check the appropriate box.

- ☐ I am the creditor.
- ☒ I am the creditor's authorized agent.

**I declare under penalty of perjury that the information provided in this Notice is true and correct to the best of my knowledge, information, and reasonable belief.**

**X** /s/Alyk L. Oflazian Date 11/16/2023  
Signature

Print: Alyk L. Oflazian Title Attorneys for Creditor

Company Manley Deas Kochalski LLC

Address P.O. Box 165028  
Number Street

Columbus, OH 43216-5028  
City State ZIP Code

Contact phone 614-220-5611 Email amps@manleydeas.com

**Exhibit B: Schedule of Amounts Outstanding Post-Petition Claim**

Description	Dates incurred	Amount
1. Late charges		(1) \$
2. Non-sufficient funds (NSF) fees		(2) \$
3. Attorney's fees		(3) \$
Plan review fees	4/9/2019	\$ 250.00
Proof of claim	5/24/2019, 6/11/2019	\$ 550.00
4. Filing fees and court costs		(4) \$
5. Advertisement costs		(5) \$
6. Sheriff/auctioneer fees		(6) \$
7. Title costs		(7) \$
8. Recording fees		(8) \$
9. Appraisal/broker's price opinion fees		(9) \$
10. Property inspection fees		(10) \$
11. Tax advances (non-escrow)		(11) \$
12. Insurance advances (non-escrow)		(12) \$
13. Escrow shortage or deficiency (Do not include amounts that are part of any installment payment listed in Part 3.)		(13) \$
14. Property preservation expenses. Specify: _____		(14) \$
15. _____ payments at \$_____ each. (Edit blanks with complete info regarding unpaid payments.)		(15) \$
16. Other. Specify: _____		(16) \$
Total postpetition fees, expenses, and charges. Add all of the amounts listed above.		(17) \$ 800.00

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>In re:</b>	:	
	:	<b>Case No.: 19-01352</b>
<b>Jeffrey Thomas Sawor</b>	:	<b>Chapter 13</b>
<b>Suzanne M. Sawor</b>	:	<b>Judge Henry W. Van Eck</b>
	:	<b>*****</b>
<b>Debtor(s)</b>		
	:	
<b>Midfirst Bank</b>	:	<b>Related Document #</b>
	:	
<b>Movant,</b>		
	:	
<b>vs</b>	:	
	:	
<b>Jeffrey Thomas Sawor</b>	:	
<b>Suzanne M. Sawor</b>	:	
<b>Jack N Zaharopoulos</b>	:	
	:	
<b>Respondents.</b>		

**CERTIFICATE OF SERVICE**

I certify that on the date of filing, a copy of the foregoing Response to Notice of Final Cure was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

Jack N Zaharopoulos, Chapter 13 Trustee, info@pamd13trustee.com

Chad J. Julius, Attorney for Jeffrey Thomas Sawor and Suzanne M. Sawor,  
cjulius@ljacobsonlaw.com

James H Turner, Attorney for Jeffrey Thomas Sawor and Suzanne M. Sawor,  
pat@turnerandoconnell.com

I certify that on the date of filing, a copy of the foregoing document was sent by U.S. Mail to the following:

Jeffrey Thomas Sawor and Suzanne M. Sawor, 2023 Furnace Road, Felton, PA 17322

/s/Alyk L. Oflazian

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**Fill in this information to identify the case:**

Debtor 1 JEFFREY THOMAS SAWOR

Debtor 2 SUZANNE M. SAWOR  
(Spouse, if filing)

United States Bankruptcy Court for the: MIDDLE District of PA  
(State)

Case Number 1:19-01352 HWV

**Official Form 410S2****Notice of Postpetition Mortgage Fees, Expenses, and Charges**

12/16

If the debtor's plan provides for payment of postpetition contractual installments on your claim secured by a security interest in the debtor's principal residence, you must use this form to give notice of any fees, expenses, and charges incurred after the bankruptcy filing that you assert are recoverable against the debtor or against the debtor's principal residence.

File this form as a supplement to your proof of claim. See Bankruptcy Rule 3002.1.

Name of creditor: LAKEVIEW LOAN SERVICING, LLC Court claim no. (if known): 5

Last 4 digits of any number you use to identify the debtor's account: 4299

Does this notice supplement a prior notice of postpetition fees, expenses, and charges?

☒ No.  
☐ Yes. Date of last notice: \_\_\_\_\_

**Part 1: Itemize Postpetition Fees, Expenses, and Charges**

Itemize the fees, expenses, and charges incurred on the debtor's mortgage account after the petition was filed. Do not include any escrow account disbursements or any amounts previously itemized in a notice filed in this case. If the court has previously approved an amount, indicate that approval in parentheses after the date the amount was incurred.

Description	Dates Incurred	Amount
1. Late Charges		(1) \$ _____
2. Non-sufficient funds (NSF) fees		(2) \$ _____
3. Attorney fees	<u>04/09/2019 – Plan Review</u>	(3) <u>\$250.00</u>
4. Filing fees and court costs		(4) \$ _____
5. Bankruptcy/Proof of claim fees	<u>05/24/2019 – Proof of Claim 410A Fee @ \$250.00</u> <u>06/11/2019 – Preparation/Filing of Proof of Claim @ \$300.00</u>	(5) <u>\$550.00</u>
6. Appraisal/Broker's price opinion fees		(6) \$ _____
7. Property inspection fees		(7) \$ _____
8. Tax advances (non-escrow)		(8) \$ _____
9. Insurance advances (non-escrow)		(9) \$ _____
10. Property preservation expenses. Specify: _____		(10) \$ _____
11. Other. Specify: _____		(11) \$ _____
12. Other. Specify: _____		(12) \$ _____
13. Other. Specify: _____		(13) \$ _____
14. Other. Specify: _____		(14) \$ _____

The debtor or trustee may challenge whether the fees, expenses, and charges you listed are required to be paid.  
See 11 U.S.C. § 1322(b)(5) and Bankruptcy Rule 3002.1.

**Part 2: Sign Here**

The person completing this Notice must sign it. Sign and print your name and your title, if any, and state your address and telephone number.

*Check the appropriate box.*

- ☐ I am the creditor.
- ☒ I am the creditor's authorized agent.

**I declare under penalty of perjury that the information provided in this claim is true and correct to the best of my knowledge, information, and reasonable belief.**

**X** /s/ Mario J. Hanyon, Esquire  
Signature

Date June 13, 2019

Print: Mario J. Hanyon, Esq., Id. No.203993  
First Name Middle Name Last Name

Title \_\_\_\_\_

Company Phelan Hallinan Diamond & Jones, LLP

Address 1617 JFK Boulevard, Suite 1400  
Philadelphia, PA 19103

Contact Phone 215-563-7000

Email mario.hanyon@phelanhallinan.com